

Ben Miller, OSB #074690
BMiller@eugene-or.gov
Eugene City Attorney's Office
125 East 8th Avenue
Eugene, OR 97401
Telephone: (541) 682-8447
Facsimile: (541) 682-5414

Of Attorneys for Defendants
City of Eugene, Sarah Medary,
Samuel Stotts, and Bo Rankin

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

**HASHEEM BOUDJERADA,
KELSIE LEITH-BOWDEN,
DAMON COCHRAN-SALINAS,
ERIN GRADY, TYLER HENDRY, and
KIRTIS RANESBOTTOM,**

Plaintiffs,

v.

**CITY OF EUGENE, a municipal
corporation; SARAH MEDARY, SAMUEL
STOTTS, BO RANKIN, and DOES 1-20,**

Defendants.

Case No: 6:20-cv-01265-MK

**DEFENDANT CITY OF EUGENE'S
OFFER OF JUDGMENT TO
PLAINTIFF KELSIE LEITH-BOWDEN**

TO: Plaintiff Kelsie Leith-Bowden by and through her attorney Marianne Dugan
1430 Willamette Street, #359
Eugene, OR 97401

Pursuant to Fed. R. Civ. P. 68, defendant City of Eugene hereby offers to allow entry of judgment as follows: Judgment in favor of plaintiff Kelsie Leith-Bowden and against defendant City of Eugene in the total sum of \$61,000.01 (Sixty One Thousand Dollars and 01/100 cent) plus all court costs and reasonable attorney fees incurred by plaintiff Kelsie Leith-Bowden to the

PAGE 1 – DEFENDANT CITY OF EUGENE'S OFFER OF JUDGMENT TO PLAINTIFF
KELSIE LEITH-BOWDEN

date of this offer in an amount to be agreed upon by the parties or, failing agreement, in an amount determined by the Court. This offer is inclusive of any Doe defendants that are City of Eugene employees or agents and intended to operate as a bar to plaintiff Kelsie Leith-Bowden from making further claims against the City or its employees or agents, known or unknown. This offer is contingent on plaintiff Kelsie Leith-Bowden dismissing her claims (if any) against other named defendants with prejudice.

Nothing in this Offer of Judgment shall be construed as an admission of liability. To the contrary, this Offer of Judgment is made in the interest of judicial economy to the Court, the parties, and their respective attorneys to settle a lawsuit and to mitigate the risk of attorney fee exposure under 42 U.S.C. § 1988.

DATED this 15th day of December 2020.

CITY OF EUGENE

By: s/ Ben Miller

Ben Miller, OSB #074690

BMiller@eugene-or.gov

Telephone: (541) 682-8447

Facsimile: (541) 682-5414


Of Attorneys for Defendants

City of Eugene, Sarah Medary,

Samuel Stotts, and Bo Rankin

Defendant City of Eugene's Offer of Judgment to Plaintiff Kelsie Leith-Bowden is hereby accepted.

DATED this 12th day of January, 2020.


Marianne Dugan, OSB #932563

Attorney for plaintiff